

# Fact Sheet



## For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-05700003-2012**

Application Received: **June 24, 2016**

Plant Identification Number: **05700003**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Beryl Plant**

Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Permit Action Number: *SM01*      Revised: *December 20, 2016*

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Physical Location:	Beryl, Mineral County, West Virginia
UTM Coordinates:	666.0 km Easting • 4371.0 km Northing • Zone 17
Directions:	The Facility is located adjacent to WV Route 46 in Mineral County near the WV - Maryland border just west of the town of Luke, MD.

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### Facility Description

The Kingsford Manufacturing Company Beryl Plant produces char from bark and sawdust raw materials. The bark and sawdust is sized, dried in a rotary dryer and then charred in a multi-hearth retort furnace. The dryer and the furnace air emissions are controlled by cyclone collectors which are exhausted to a common after combustion chamber (ACC) for oxidation. Air emissions from the ACC stack are subject to emissions limits in Permit R13-2117E. The char is quenched and conveyed into covered trucks for transport to the Kingsford Parsons, WV plant for charcoal manufacturing.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

This significant modification incorporates changes covered by recently issued permit R13-2117E related to increased permitted limit of wood char production to 5.0 TPH and 32,000 TPY.

## Emissions Summary

As the result of this modification the total emissions from the facility are changed as follows:

Regulated Pollutants	Emission change (TPY)
Carbon Monoxide (CO)	+ 3.92
Nitrogen Oxides (NO <sub>x</sub> )	+ 25.84
Particulate Matter (PM <sub>2.5</sub> )	+ 15.22
Particulate Matter (PM <sub>10</sub> )	+ 13.12
Total Particulate Matter (TSP)	+ 0.78
Sulfur Dioxide (SO <sub>2</sub> )	+ 6.00
Volatile Organic Compounds (VOC)**	+ 1.16
HAPs	- 4.26

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains potential to emit over 100 tons per year of PM<sub>10</sub> and NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This significant modification has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Fugitive dust, particulate matter, and visible emissions.
	45CSR10	Sulfur dioxide emissions.
	45CSR13	Preconstruction permits for sources.
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2117E	November 1, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

1. Emission Units Table 1.1 – Char to Trailer (Emission Unit 002-09), Rotary Wood Dryer (Emission Unit ID 003-01) and Multi-Hearth Retort Furnace (Emission Unit ID 003-02) capacities were increased.
2. Sections 3.0, 4.0, 5.0 and 6.0 requirements were revised according the permit R13-2117E. Format of the R13-2117 permit was changed from old (R13-2117D) to new (R13-2117E) resulting in the revision of several citations and reorganizing of conditions in addition to the increased capacities of the equipment listed in item 1 above, the wood char production limit (condition 5.1.2) and the emission limits (condition 6.1.1).
3. Requirement 6.3.1 - since new emission limit for PM<sub>2.5</sub> was added to requirement 6.1.1, the "PM<sub>2.5</sub>" pollutant was also added to the testing table. The testing methods for PM<sub>10</sub> (and for PM<sub>2.5</sub>) were also revised per company's request from "EPA Reference Method 201 and 202" to "Modified EPA Reference Method 201 and EPA Reference Method 202". Due to extremely high temperatures in the ACC (approximately 1,800°F) an in-stack cyclone separator can't be used for testing, therefore the company proposed to use an out-of-stack Anderson 8 Stage Impactor to measure the filterable PM<sub>10</sub> and PM<sub>2.5</sub> fractions.

## Non-Applicability Determinations

Testing required per conditions 6.3.1 and 6.3.2 is intended to be once per permit term and re-testing is not intended with the issuance of this significant modification.

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

## Comment Period

Beginning Date: November 4, 2016  
Ending Date: December 5, 2016

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova  
Title V Permit Writer  
West Virginia Department of Environmental Protection

Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

During public comment period (on November 21, 2016) we received comments from the Kingsford Manufacturing Company. Per the comments, the following corrections to the permit and the fact sheet were made:

1. Emission Units Table 1.1 – Char to Trailer (Emission Unit 002-09) capacity was revised from 28,000 TPY to 32,000 TPY as per revised requirement 5.1.2.
2. Requirement 6.3.1 – since new emission limit for PM<sub>2.5</sub> was added to requirement 6.1.1, the “PM<sub>2.5</sub>” pollutant was also added to the testing table that was overlooked in the draft. The testing methods for PM<sub>10</sub> (and for PM<sub>2.5</sub>) were also revised per company’s request from “EPA Reference Method 201 and 202” to “Modified EPA Reference Method 201 and EPA Reference Method 202”. Due to extremely high temperatures in the ACC (approximately 1,800°F) an in-stack cyclone separator can’t be used, therefore the company proposed to use an out-of-stack Anderson 8 Stage Impactor to measure the filterable PM<sub>10</sub> and PM<sub>2.5</sub> fractions.
3. Requirement 6.3.2 – per Company’s request the following explanation was added to the “Non-Applicability Determinations” section of the fact sheet:  
  
“Testing required per conditions 6.3.1 and 6.3.2 is intended to be once per permit term and re-testing is not intended with the issuance of this significant modification”.

Also, on December 7, 2016 we received comments from EPA, but these comments didn’t result in any changes of the permit or fact sheet.